



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

March 19, 2018

By ECF and Electronic Mail

Honorable Analisa Torres
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *The New York Times Company and Charlie Savage v. Department of Justice*,
18 Civ. 2054 (AT)

Dear Judge Torres:

This Office represents defendant Department of Justice ("DOJ") in the above-referenced matter, which was brought pursuant to the Freedom of Information Act, 5 U.S.C. § 552 ("FOIA"). We write respectfully, and with plaintiffs' consent, to request an adjournment of the initial pretrial conference currently scheduled for April 2, 2018, and a corresponding extension of the parties' March 26, 2018 deadline to submit a pre-conference letter and proposed scheduling order.

The undersigned counsel for DOJ is scheduled to be on vacation on April 2, 2018, and DOJ's deadline to answer the complaint is not until April 13, 2018. Moreover, as the parties have discussed, DOJ expects that developments over the next two weeks in other FOIA lawsuits pending in multiple district courts will impact the parties' proposed schedule in this matter. For all of these reasons, DOJ respectfully requests that the April 2, 2018 initial pretrial conference be rescheduled for a date during the weeks of April 23, 2018 or April 30, 2018, or another date that is convenient for the Court. In addition, DOJ requests that the parties' current deadline to submit a pre-conference letter and proposed scheduling order be reset to one week prior to the date of the rescheduled pretrial conference. Should the Court grant this letter motion, we note, for purposes of re-scheduling the initial pretrial conference, that counsel for Plaintiffs is not available on Tuesday, April 24, 2018.

This is DOJ's first request for an adjournment of the initial pretrial conference and the deadline to submit a pre-conference letter and proposed scheduling order. Counsel for Plaintiffs consents to these requests.

We thank the Court for its consideration of this matter.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

By: /s/ Andrew E. Krause
ANDREW E. KRAUSE
Assistant United States Attorney
Telephone: 212-637-2769
Facsimile: 212-637-2786
E-mail: andrew.krause@usdoj.gov

cc: All counsel of record via ECF